# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

#### CASE NO. 9:16-CV-80079-RLR

GREENFLIGHT VENTURE CORPORATION,

Plaintiff,

v.

WHITEPAGES, INC., TRUE SOFTWARE SCANDINAVIA A.B., and ALEX ALGARD,

Defendants.

JOINT MOTION TO TRANSFER TO NORTHERN DISTRICT OF CALIFORNIA

Pursuant to 28 U.S.C. § 1404(a), Plaintiff Greenflight Venture Corporation and Defendant True Software Scandinavia A.B. by and through their undersigned counsel, hereby file this joint motion to transfer this action to the Northern District of California.

Greenflight Venture Corporation sued True Software Scandinavia A.B. for infringement of U.S. Patent No. 8,861,698 ("the '698 patent") in the Southern District of Florida. Shortly before, Whitepages, Inc. filed a complaint against Greenflight Venture Corporation for a declaratory judgment of non-infringement of the '698 patent in the Northern District of California, case no. 3:16-cv-175-RS. Greenflight recently counterclaimed for infringement in that action.

28 U.S.C. § 1404(a) permits transfer to another district where the case could have been brought or to which all parties consent, for the convenience of the parties and witnesses. Given that another case is pending in the Northern District of California on the same patent, and True

1

Software has a location in the Northern District of California, the parties hereby jointly consent and move this Court to transfer this action to the Northern District of California pursuant to 28 U.S.C. § 1404(a).

## Respectfully submitted,

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Counsel for GREENFLIGHT VENTURE CORPORATION	Counsel for TRUE SOFTWARE SCANDINAVIA A.B.

## **CERTIFICATE OF SERVICE**

I hereby certify that on the 5<sup>th</sup> day of April, 2016, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

*s/James F. Herbison*James F. Herbison

### **SERVICE LIST**

GREENFLIGHT VENTURE CORPORATION v. WHITEPAGES, INC., et al. CASE NO.: 9:16-CV-80079-RLR

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